

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
LOCKSLEY MORGAN,	:	VIOLATION:
a/k/a “Jordy Chams”	:	21 U.S.C. §846 (conspiracy to possess with
a/k/a “Apple,”	:	intent to distribute more than 1,000
MAXWELL BROWN		kilograms of marijuana - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From at least in or about May 1999 through in or about December 2000, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

LOCKSLEY MORGAN,
a/k/a “Jordy Chams”
a/k/a “Apple,” and
MAXWELL BROWN

conspired and agreed, together and with Astley Grant, charged elsewhere, and with others known and unknown to the grand jury, to knowingly and intentionally possess with the intent to distribute in excess of 1000 kilograms of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants LOCKSLEY MORGAN and MAXWELL BROWN were members of a drug transportation organization that moved thousand-kilogram quantities of marijuana from Texas to the Philadelphia area using tractor trailer trucks.

3. Defendants LOCKSLEY MORGAN and MAXWELL BROWN contributed money to purchase the thousand-kilogram quantities of marijuana that came from Texas to be distributed in the Philadelphia area.

4. Defendants LOCKSLEY MORGAN and MAXWELL BROWN at times met the drivers of tractor trailer trucks in Texas where the marijuana would be paid for and loaded onto the tractor trailers for transportation back to the Philadelphia area.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. In or about the second week of March 2000, defendants LOCKSLEY MORGAN and MAXWELL BROWN, and others known to the grand jury, transferred to co-conspirator Astley Grant approximately \$900,000 (“the cash”) at a nightclub called Trendsetters in the area of 53rd Street and Woodland Avenue, Philadelphia, Pennsylvania.

2. In or about the second week of March 2000, co-conspirator Astley Grant drove a tractor trailer truck from Philadelphia to Texas with the cash to purchase several thousand pounds of marijuana.

3. On or about March 16, 2000, defendants LOCKSLEY MORGAN and MAXWELL BROWN, and others known to the grand jury, received back the cash from co-conspirator Astley Grant at the Super 8 Motel in Pharr, Texas.

4. On or about March 19, 2000, defendants LOCKSLEY MORGAN and MAXWELL BROWN, and others known to the grand jury, loaded Astley Grant's tractor trailer truck with approximately 6,200 pounds of marijuana.

5. On or about March 19, 2000, co-conspirator Astley Grant drove the tractor trailer truck loaded with approximately 6,200 pounds of marijuana as far as Falfurrias, Texas, where he was stopped by Texas border patrol agents and the marijuana was seized.

All in violation of Title 21, United States Code, Section 846.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**